

**BellSouth Telecommunications, Inc.**

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August 1, 2006

The Honorable Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: BellSouth Telecommunications, Inc.'s Petition for Review of NXX Code  
Denial in the Columbia Rate Center  
Docket No. 2006-187-C

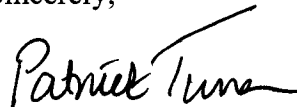
Dear Mr. Terreni:

As indicated in the Commission's July 25, 2006 Directive in this docket, the Commission has voted to override NANPA's denial and to approve the issuance of the numbers requested in the Petition filed by BellSouth Telecommunications, Inc. ("BellSouth") on July 12, 2006. BellSouth's customer, Lexington County School District 5, is eager to have the numbers assigned as quickly as possible.

In order to facilitate the customer's desire, I have enclosed for filing an original and one (1) copy of BellSouth's Proposed Order Reversing NANPA decision. This Proposed Order is based on, and consistent with, Order No. 2005-603 that the Commission entered in Docket No. 2005-292-C. This document is an exact duplicate of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter, I am serving a copy of this document on NANPA, NeuStar, and the ORS, as indicated on the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/sgm  
Attachment  
DM5 640974

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

IN RE: Petition of BellSouth Telecommunications,     )  
      Inc. for Review of NXX Code Denial in the     ) DOCKET NO. 2006-187-C  
      Columbia Rate Center.                             )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
PROPOSED ORDER REVERSING NANPA DECISION**

This matter comes before the Public Service Commission of South Carolina (the Commission) on the Petition for Review of the denial by the North American Numbering Plan Administration (NANPA) of BellSouth Telecommunications, Inc.'s (BellSouth's or the Company's) application for use of central office code numbering resources in the 803 area code.

The Federal Communications Commission (FCC) has set a "rate center" basis for determining the need for new numbering resources. Under FCC rules, carriers must establish that existing inventory within the carrier's rate center will be exhausted within six months of their code application (months-to-exhaust or MTE), and the carriers had to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources. The utilization threshold has increased by five percent per year, and has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.

On or about June 19, 2006, according to BellSouth, the Company submitted a Pooling Administration System request to NANPA and NeuStar for the assignment of three consecutive thousand number blocks with the same NXX in the Columbia Dutch Fork, South Carolina Central Office. These numbers are needed, according to BellSouth, to meet the numbering demands of Lexington District 5 Schools. This customer is requesting additional telephone numbers for use with Primary Rate ISDN ("PRI") service to be installed at its new elementary school being constructed at 1 River Bottom Road, Irmo, South Carolina. This school is expected to open in August 2006. Additionally the School District needs these numbering resources to convert service at its 23 existing schools to Voice over Internet Protocol service. As BellSouth does not have existing numbers to meet the customer's request, three consecutive one-thousand numbers with the same NXX are needed. If such blocks are not available in existing NXXs in the Dutch Fork Central Office, then a new NXX needs to be assigned. According to BellSouth, the Company's application was completed in accordance with Industry Numbering Committee's (INC's) and/or NANPA's guidelines and filled out the necessary MTE Certification Worksheets. At the time of the filing of the code request, the BellSouth Columbia Rate Center had an MTE of 76.05 months and a utilization of 73.39%.

Thereafter, on June 27, 2006, NANPA's Central Office Code Administration denied BellSouth's code request because BellSouth had not met the rate center based MTE criterion now set forth in the Central Office Code (NXX) Guidelines. The Company notes that NANPA denied BellSouth's code requests, despite the fact that BellSouth does not have adequate numbering resources needed to satisfy its customer's demands in the Columbia Rate Center.

BellSouth states that its inability to provide this important customer with the requested numbers prevents BellSouth from providing the quality of service this customer desires, needs, and expects. BellSouth notes that if it is not assigned the NXX thousand number blocks needed to meet the customer's request, BellSouth will be unable to provide telecommunications services requested by the customer. Further, according to BellSouth, NANPA's refusal to grant numbering resources sufficient to meet the customer's needs is inconsistent with the FCC's position that "[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources." FCC 00-429 at Paragraph 61.

According to BellSouth, both the FCC's rules and the Central Office Code (NXX) Assignment Guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. Prior to the FCC's Order and the resulting change in the Central Office Code (NXX) Assignment Guidelines, the MTE procedures used by NANPA permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, NANPA looks at MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory." FCC 01-362, Paragraph 64. In addition, the FCC has

ruled that, “States...may grant requests for customers seeking contiguous block of numbers.” Id.

BellSouth therefore requests that this Commission reverse NANPA’s decision to withhold numbering resources from the Company on several grounds. First, BellSouth notes that NANPA’s decision to withhold numbering resources from BellSouth interferes with BellSouth’s ability to provide telecommunication services to its customers as required under South Carolina law. Second, BellSouth states that its request for numbering resources would not materially impact exhaustion of the 803 area code. Lastly, BellSouth states that other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review NANPA denials and to order the release of number resources to BellSouth to meet customer needs. Specifically, BellSouth requests that this Commission: reverse the decision of NANPA denying BellSouth’s request for additional numbering resources; and direct NANPA to provide the requested three consecutive thousand number blocks with the same NXX for the Columbia Dutch Fork Wire Center and, if necessary to accomplish this, assign a new NXX in this wire center.

We agree with BellSouth, and hereby reverse NANPA’s decision. We hold that BellSouth has demonstrated that it has received a customer request for numbering resources in a given rate center that BellSouth cannot meet with its current inventory. NANPA is hereby directed to approve BellSouth’s code assignment request originally submitted on or about June 19, 2006, for three consecutive thousand number blocks with the same NXX to meet the numbering demands of Lexington District 5 Schools in the Columbia Dutch Fork, South Carolina Central Office as soon as possible. We further

direct NANPA to assign a new NXX in this wire central if necessary to accomplish this. We believe that the additional numbering resource is necessary to meet the legitimate demands of BellSouth's customer for telecommunications service. Further, it should be noted that this request would not materially impact exhaustion of the available NXXs in the 803 area code.

This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:

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G. O'Neal Hamilton, Chairman

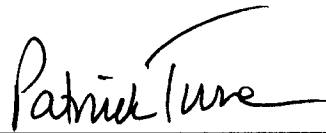
ATTEST:

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C. Robert Moseley, Vice Chairman

(SEAL)

Respectfully submitted:



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PATRICK W. TURNER  
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1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

STATE OF SOUTH CAROLINA

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CERTIFICATE OF SERVICE

COUNTY OF RICHLAND

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The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Proposed Order Reversing NANPA Decision of NXX Code Denial in the Columbia Rate Center in Docket No. 2006-187-C to be served by the method indicated below upon the following this August 1, 2006:

Thomas C. Foley  
NPA Relief Planner – Eastern Region NANPA  
NeuStar – NANPA  
820 Riverbend Blvd.  
Longwood, FL 32779-2327  
**(U. S. Mail)**

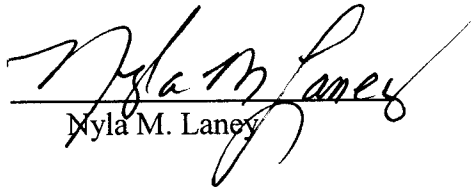
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Nyla M. Laney

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